

JUDGE KAPLAN

08 CIV 62327

BLANK ROME LLP
Attorneys for Plaintiff
Jeremy J.O. Harwood (JH 9012)
405 Lexington Avenue
The Chrysler Building
New York, NY 10174
(212) 885-5000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



WORLD FUEL SERVICES (EUROPE) LTD.
TRANS-TEC INTERNATIONAL S.R.L.,
and
TRAMP OIL AND MARINE (CHILE) SA.,

VERIFIED COMPLAINT

Plaintiffs,

v.

EUROPA WEST-INDIE LIJNEN, B.V.,

Defendant.

Plaintiffs WORLD FUEL SERVICES (EUROPE) LTD. ("WFSE"), TRANS-TEC INTERNATIONAL S.R.L., ("TTI") and TRAMP OIL AND MARINE (CHILE) SA. ("Tramp") (collectively "Plaintiff"), complaining of the above-named Defendant EUROPA WEST-INDIE LIJNEN B.V. ("EWL"), allege upon information and belief as follows:

1. This is a case of admiralty and maritime jurisdiction, as hereinafter more fully appears, and is an admiralty or maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure. The Court has subject matter jurisdiction.

2. At all material times, WFSE was and now is a company organized and existing under the laws of England, TTI was and now is a company organized and existing under the laws of Costa Rica, and Tramp was and now is a company organized and existing under the laws of

Chile.

3. At all material times, defendant EWL was and now is a corporation organized and existing under the laws of the Netherlands.

THE BASIC FACTS

4. Pursuant to Plaintiffs' contracts with EWL (the "Contracts") WFSE, TTI and Tramp at various times in the latter part of 2007 and into 2008 sold marine fuel to EWL for the fueling of ocean cargo vessels that EWL owned, operated or chartered. EWL, however, did not pay for all of that fuel and did not pay certain other contractual charges which EWL had agreed with WFSE, TTI and Tramp to pay.

5. The amount that EWL owes to WFSE, TTI and Tramp, including for contractual interest and related charges under the Contracts, is at least \$1,500,000.

6. The Contracts provide for jurisdiction over disputes arising under them in Miami, Florida and this Rule B action is filed without waiver of that jurisdiction clause.

COUNT I **RULE B RELIEF**

7. Plaintiffs repeat paragraphs 1 through 6 as if fully set forth herein.

8. Plaintiffs seek issuance of process of maritime attachment so that it may obtain security for its claims including its attorneys' fees and costs as permitted by the contracts. No security for Plaintiffs' claims has been posted by EWL or anyone acting on its behalf to date.

9. Defendant cannot be found within this district within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure ("Rule B"), but is believed to have, or will have during the pendency of this action,

assets in this jurisdiction.

WHEREFORE, Plaintiffs pray:

A. That process in due form of law issue against EWL, citing it to appear and answer under oath all and singular the matters alleged in the Verified Complaint;

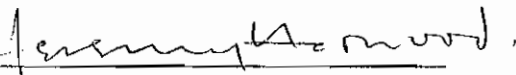
B. That since EWL cannot be found within this District pursuant to Rule B, this Court issue an Order directing the Clerk of Court to issue Process of Maritime Attachment and Garnishment pursuant to Rule B attaching all of EWL's tangible or intangible property or any other funds held by any garnishee, which are due and owing to EWL up to the amount of \$1,500,000 to secure the Plaintiffs' claims, and that all persons claiming any interest in the same be cited to appear and, pursuant to Rule B, answer the matters alleged in the Verified Complaint;

C. That this Court retain jurisdiction over this matter through the entry of a judgment or award associated with the pending claims including appeals thereof.

D. That each Plaintiff may have such other, further and different relief as may be just and proper.

Dated: New York, NY
July 9, 2008

Respectfully submitted,
BLANK ROME LLP
Attorneys for Plaintiffs

By 
Jeremy J.O. Harwood (JH 9012)
405 Lexington Avenue
New York, NY 10174
Tel.: (212) 885-5000

OF COUNSEL:
J. Stephen Simms (JS 8990)
Simms Showers LLP
20 S. Charles Street - Suite 702
Baltimore, Maryland 21201
410-783-5795

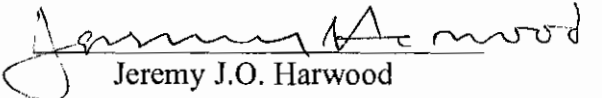
VERIFICATION

Jeremy J.O. Harwood certifies as follows:

1. I am a member of the bar of this Honorable Court and of the firm of Blank Rome LLP, attorneys for Plaintiff.
2. I have read the foregoing Complaint and I believe the contents thereof are true.
3. The reason this Verification is made by deponent and not by Plaintiffs is that Plaintiffs are foreign corporations, no officers or directors of which are within this jurisdiction.
4. The sources of my information and belief are documents provided to me and statements made to me by representatives of Plaintiffs.

I certify under penalty of perjury
that the foregoing is true and correct.

Executed on July 9, 2008.


Jeremy J.O. Harwood

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**AFFIDAVIT UNDER
SUPPLEMENTAL RULE B**

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

JEREMY J.O. HARWOOD, being duly sworn, deposes and says:

1. I am a member of the Bar of this Honorable Court and a member of the firm of Blank Rome LLP, attorneys for the Plaintiff herein. I am familiar with the circumstances of the complaint and submit this affidavit in support of Plaintiffs' request for the issuance of process of maritime attachment and garnishment of the property of defendant EUROPA WEST-INDIE LIJNEN, B.V., a company organized and existing

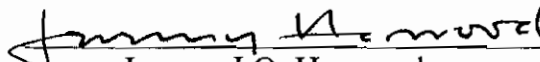
under the laws of The Netherlands, pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

2. The defendant is not incorporated or registered to do business in this State.

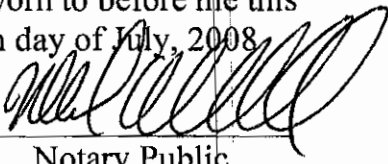
3. Under my supervision, my office did a search of the New York State Secretary of State, Division of Corporations, Transportation Tickler (2008 edition), telephone assistance in New York City, and the internet Yellow Pages.

4. In our search, we did not find any listing or reference to defendant in this district or state.

5. In the circumstances, I believe the defendants cannot be "found" within this district.


Jeremy J.O. Harwood

Sworn to before me this
9th day of July, 2008



Notary Public

NEAL MITCHELL
Notary Public, State of New York
No. 01M16114408
Qualified in New York County
Commission Expires Aug. 16, 2008